

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DARLENE SHEILS,)	
)	
Plaintiff,)	Case No. 12 CV 2766
)	
v.)	Judge Shah
)	
GATEHOUSE MEDIA, INC.,)	Jury Trial Demanded
GATEHOUSE MEDIA SUBURBAN)	
NEWSPAPERS, INC., and SHAW)	
SUBURBAN MEDIA GROUP, INC.,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR
ENTRY OF FINAL JUDGMENT**

Plaintiff, Darlene Sheils, by her attorneys, Pedersen & Weinstein LLP, respectfully submits this motion for entry of final judgment consistent with the Court's Memorandum Opinion and Order dated October 27, 2015 [Doc. 132]. Specifically, judgment should be entered against GateHouse Media, Inc. and GateHouse Media Suburban Newspapers, Inc. as follows:

Back pay award for FMLA retaliation – discharge and Illinois retaliatory discharge claims	\$62,036.01
Liquidated damages	\$62,036.01
Prejudgment interest through March 17, 2016 ¹	\$11,180.64
Liquidated damages through March 17, 2016	\$11,180.64
Overtime	\$1,125
Liquidated damages	\$1,125
Penalty under Illinois law	\$1,372.50
Offset for adverse tax consequences	\$6,203.60
Emotional distress	\$60,000
Punitive damages	\$125,000
Total	\$341,259.40

¹ Plaintiff's updated calculation of prejudgment interest is attached as Exhibit A.

Additionally, pursuant to the Court's October 27, 2015 order, judgment should be entered for the same amounts against Shaw Suburban Media Group, Inc. based on successor liability.

[Doc. 132 p. 38].

Pursuant to the Court's order and Local Rule 54.3(b), Plaintiff will submit a fee petition no later than 91 days after the entry of judgment. [Doc. 132 p. 34].

Dated: February 25, 2016

Respectfully submitted,

By: /s/Jill Weinstein

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2016 a copy of the foregoing *Plaintiff's Motion for Entry of Final Judgment* was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic case filing system. Parties may access this filing through the Court's system.

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